## KIRKLAND & ELLIS LLP

AND AFFILIATED PARTNERSHIPS

1301 Pennsylvania Avenue NW Washington, D.C. 20004 United States

+1 202 389 5000

www.kirkland.com

USDC SDNY
DOCUMENT
ELEÇTRONICALLY FILED
DOC #:
DATE FILED: 5/28/20

Facsimile: +1 202 389 5200

May 27, 2020

#### **Via Electronic Filing**

Judson Brown, P.C.

To Call Writer Directly:

+1 202 389 5082 jdbrown@kirkland.com

United States Magistrate Judge Barbara Moses Courtroom 20A United States Courthouse 500 Pearl Street New York, New York 10007

# MEMO ENDORSED

Re: Compass Prods. Int'l LLC v. Charter Common's, Inc., No. 1:18-cv-12296

(S.D.N.Y.)

## Dear Judge Moses:

Plaintiff Compass Productions International LLC and Defendant Charter Communications, Inc. (the "parties") request leave to file Exhibit 1 to the parties' May 27, 2020 Joint Status Letter under seal. Exhibit 1 is a Compass Productions International LLC 2015-2016 income statement, produced by Compass during this litigation. It is labeled Confidential pursuant to the Protective Order (ECF 30). Compass's counsel has requested that all financial information be redacted from Exhibit 1 before it is publicly filed.

Consistent with Paragraph 8 of the Protective Order and this Court's Individual Rules of Practice, Charter has publicly filed a version of the Joint Status Letter and exhibits with Compass's requested redactions applied to Exhibit 1, and is also filing under seal a version with Compass's requested redactions to Exhibit 1 highlighted for the Court.

Application GRANTED. The unredacted version of plaintiff's 2015-2016 income statement (Exhibit 1 to the parties' May 27, 2020 Joint Status Letter (Dkt. No. 54-1)) has not been submitted in connection with any merits motion and will remain under seal at present. SO ORDERED.

Barbara Moses, U.S.M.J.

May 28, 2020

## KIRKLAND & ELLIS LLP

The Honorable Barbara Moses May 27, 2020 Page 2

## Sincerely,

## /s/ Judson Brown

Judson Brown, P.C. (pro hac vice)
Devin S. Anderson (pro hac vice)
K. Ross Powell (pro hac vice)
Kirkland & Ellis LLP
1301 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Telephone: (202) 389-5000
judson.brown@kirkland.com
devin.anderson@kirkland.com
ross.powell@kirkland.com

Attorneys for Defendant Charter Communications, Inc.

## /s/ Jonathan E. Neuman

Jonathan E. Neuman, Esq. 176-25 Union Turnpike, Suite 230 Fresh Meadows, New York 11366 (347) 450-6710 (718) 228-3689 facsimile jnesq@jenesqlaw.com

Attorney for Plaintiff Compass Productions International, LLC